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*Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746
REGARDING THE PLAN ADMINISTRATOR'S FIVE HUNDRED TWELFTH
OMNIBUS OBJECTION TO CLAIMS (DISPUTED VALUATION CLAIMS)**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On November 13, 2015, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors*, filed the Plan Administrator's Five Hundred Twelfth Omnibus Objection to Claims (Disputed Valuation Claims) [ECF No. **51450**] (the "Claims Objection") with the Court for hearing.

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the “Response Deadline”) for parties to object or file responses to the Claims Objection. The Response Deadline was set for December 10, 2015 at 4:00 p.m. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed. To the best of my knowledge, no responsive pleadings have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Plan Administrator with respect to the portions of the Disputed Valuation Claims held by the parties listed on Exhibit A hereto. Accordingly, the Plan Administrator respectfully requests that the proposed order granting the Claims Objection annexed hereto as Exhibit B, as to the portions of the claims held by the parties listed on Exhibit 1 to the proposed order, be entered in accordance with the procedures described in the Second Amended Case Management Order. No changes have been made that would affect the Disputed Valuation Claims.

I declare that the foregoing is true and correct.

Dated: December 15, 2015
New York, New York

/s/ Garrett A. Fail

Garrett A. Fail

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Exhibit A

Claim No.	Claimant
27822	Andorra Banc Agricol, REIG, S.A.
27823	Andorra Banc Agricol, REIG, S.A.
27873	Andorra Banc Agricol, REIG, S.A.
27822	Granite Finance Limited
27823	Granite Finance Limited

Exhibit B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (SCC)
	:
Debtors.	: (Jointly Administered)
-----X	

**ORDER GRANTING FIVE HUNDRED TWELFTH OMNIBUS
OBJECTION TO CLAIMS (VALUED DERIVATIVE CLAIMS)**

Upon the five hundred twelfth omnibus objection to claims, dated November 13, 2015 (the “Five Hundred Twelfth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to reduce and allow or disallow and expunge the Disputed Valuation Claims, all as more fully described in the Five Hundred Twelfth Omnibus Objection to Claims; and due and proper notice of the Five Hundred Twelfth Omnibus Objection to Claims having been provided as stated therein, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Five Hundred Twelfth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Five Hundred Twelfth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Five Hundred Twelfth Omnibus Objection to Claims.

ORDERED that the relief requested in the Five Hundred Twelfth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that the portions of claim numbers 27822, 27873 and 27823 held by the parties listed on Exhibit 1 annexed hereto are hereby disallowed and expunged in their entirety; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim or portion of claim listed on Exhibit A annexed to the Five Hundred Twelfth Omnibus Objection to Claims that is not listed on Exhibit 1; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2015
New York, New York

UNITED STATES BANKRUPTCY JUDGE

OMNIBUS OBJECTION 512: EXHIBIT 1 - DISPUTED CLAIMS

	NAME	CLAIM #	FILED DATE	DEBTOR NAME	AMOUNTS		
					UNSECURED	TOTAL	
1	ANDORRA BANC AGRICOL REIG, S.A.	27822	9/22/09	Lehman Brothers Holdings Inc.	TOTAL ASSERTED AMOUNT	Undetermined	Undetermined*
					CLAIM AS MODIFIED	None	\$0.00
2	ANDORRA BANC AGRICOL REIG, S.A.	27823	9/22/09	Lehman Brothers Holdings Inc.	TOTAL ASSERTED AMOUNT	Undetermined	Undetermined*
					CLAIM AS MODIFIED	None	\$0.00
3	ANDORRA BANC AGRICOL REIG, S.A.	27873	9/22/09	Lehman Brothers Holdings Inc.	TOTAL ASSERTED AMOUNT	Undetermined	Undetermined*
					CLAIM AS MODIFIED	None	\$0.00
4	GRANITE FINANCE LIMITED	27822	9/22/09	Lehman Brothers Holdings Inc.	TOTAL ASSERTED AMOUNT	Undetermined	Undetermined*
					CLAIM AS MODIFIED	None	\$0.00
5	GRANITE FINANCE LIMITED	27823	9/22/09	Lehman Brothers Holdings Inc.	TOTAL ASSERTED AMOUNT	Undetermined	Undetermined*
					CLAIM AS MODIFIED	None	\$0.00

TOTAL ASSERTED	\$0.00	\$0.00
TOTAL NOT SUBJECT TO OBJECTION	0.00	0.00
TOTAL SUBJECT TO OBJECTION	0.00	0.00
TOTAL CLAIM AS MODIFIED	\$0.00	\$0.00